

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES
(APWU/USPS-T4—22-27 AND 30)
(March 9, 2012)**

The United States Postal Service provides the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the American Postal Workers Union, AFL-CIO, dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response. The responses to APWU/USPS-T4-28 and 29 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES

APWU/USPS-T4-22 In your response to POIR 1 Q7 on your productivity calculations, you stated "Because the Postal Service must staff for an eight-hour tour, I found which hour of each tour required the most staffing and then compared the values for the needed complement busiest hour with the complement needed for the other hours of the tours."

- a) Does your methodology assume that every person working during the peak load period of a particular tour is working for eight hours? If so, on what is that assumption based?
- b) Suppose 20-30 percent of the mail processing employees were working for periods shorter than eight hours; would that change your underlying assumption? If so, how much would your productivity estimates change?
- c) Does your methodology account for scheduling tools that set start times to result in higher staffing during peak hour by overlapping shifts?

RESPONSE:

a) Yes. This assumption was utilized as a starting point for the analysis. As described in Presiding Officer's Information Request No. 1, Question 7, I recognized that there are components which would not allow us to reach the full opportunity this analysis suggested, which was 28 percent, and thus I utilized 15 percent.

b) Yes. The scenario described in this subpart would require a more complex analysis performed at a site-by-site level. Based on this level of analysis, we would anticipate the potential for an expected improvement greater than 28 percent.

c) No.

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APWU/USPS-T4-23 In your response to APWU/USPS-T4-2 (i-j) you state that there are no data sources that could be used to develop an appropriate class or product-wide representative O/D pair flow by delivery time period for periodicals, especially Within County and smaller periodicals mailers. What information is the Postal Service using to estimate the impact of the proposed changes on this group of mailers?

RESPONSE:

In both its Advanced Notice of Proposed Rulemaking and its Proposed Rule, the Postal Service requested comments from mailers. The Postal Service is relying on mailers and individuals to share concerns with the proposal, and the Postal Service will consider these concerns as it develops the final rule.

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APWU/USPS-T4-24 In response to APWU/USPS-T4-3 you state that the impact on the delivery profile of Priority Mail could not be determined until the AMP studies were completed.

- a) Now that the AMP studies are completed, can you provide a better estimate of the impact of the proposed changes on the actual delivery profile of Priority Mail?
- b) Can you determine if the delivery of this product will now require stand-alone processing or transportation when it could previously be co-processed and cotransported with other classes of mail?

RESPONSE:

Please see the response to APWU/USPS-T1-34.

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APWU/USPS-T4-25 In response to APWU/USPS-T4-4 you state that the impact on the delivery profile of Express Mail could not be determined until the AMP studies were completed.

a) Now that the AMP studies are completed, can you provide a better estimate of the impact of the proposed changes on the actual delivery profile of Express Mail?

b) Can you determine if the delivery of this product will now require stand-alone processing or transportation when it could previously be co-processed and cotransported with other classes of mail?

RESPONSE:

Please see the response to APWU/USPS-T1-34.

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APWU/USPS-T4-26 In your response to TI/USPS-T4-1 you indicate that as many as 10 FSS machines might be moved. Has the completion of the AMPs clarified how many of the FSS machines will be moved if the full set of approved AMPs are implemented?

RESPONSE:

Because the AMP review process is not complete, and some AMPs are still under review and evaluation, I cannot provide an accurate assessment regarding the relocation of FSS machines in the Postal Service network that would occur if the changes proposed in this docket are implemented. But based on the AMP study results available at this time, the Postal Service anticipates that it will move FSS machines from the following sites approved for consolidation: Fox Valley (2), Herb Peck Annex (2), Stamford CT (1), Van Nuys FSS Annex (3), and NW Boston (3). This information is different than the original list of 10 FSS machines due to the change in studies that occurred during the review process.

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APWU/USPS-T4-27 There is no outgoing secondary sortation in your proposed operating plan (p. 22), is that because of longer operational windows or because there are fewer nodes in the network? If it is the latter, were the number of AMPs that were approved dependent on reducing the number of nodes to make that possible?

RESPONSE:

Longer operational windows and the reduced number of nodes in the network both contributed to the absence of secondary sortation in the proposed operating plan. To the extent that there are fewer nodes in the network, after the AMP evaluation process is complete, there will remain approximately 148 sites that process destinating primary letters. In this proposed network, there will be no need for outgoing secondary processing.

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APWU/USPS-T4-30 For each product listed in APWU/USPS-T4-28(a-f) please provide the FY 2010 Origin 3-Digit Zip-to-Destination 3-Digit ZIP mail volumes for all origin-destination pairs.

RESPONSE:

Please see USPS Library Reference USPS-LR-N2012-1/NP17. The sources of data available to me contain ODIS data for only the following sub-classes of parcels: First Class Mail Parcels, BPM Parcels, Media and Library parcels, and Single Piece Parcel Post.